



DAVIDOFF HUTCHER & CITRON LLP

ATTORNEYS AT LAW  
605 THIRD AVENUE  
NEW YORK, NEW YORK 10158

TEL: (212) 557-7200  
FAX: (212) 286-1884  
WWW.DHCLLEGAL.COM

FIRM OFFICES

WHITE PLAINS  
ATTORNEYS AT LAW  
120 BLOOMINGDALE ROAD  
WHITE PLAINS, NY 10605  
(914) 381-7400

WEST PALM BEACH  
ATTORNEYS AT LAW  
1107 NORTH OLIVE AVENUE  
WEST PALM BEACH, FL 33401  
(561) 567-8488

FIRM OFFICES

ALBANY  
ATTORNEYS AT LAW  
150 STATE STREET  
ALBANY, NY 12207  
(518) 465-8230

WASHINGTON, D.C.  
ATTORNEYS AT LAW  
201 MASSACHUSETTS AVENUE N.E.  
WASHINGTON, D.C. 20002  
(202) 347-1117

WRITER'S DIRECT: 914-381-7400  
E-MAIL: [RLR@DHCLEGAL.COM](mailto:RLR@DHCLEGAL.COM)

September 16, 2022

VIA ELECTRONIC FILING AND EMAIL

Honorable Sean H. Lane  
U.S. Bankruptcy Court  
Southern District of N.Y.  
300 Quarropas Street  
White Plains, New York 10601

**Re: In re The Gateway Development Group, Inc., Debtor  
Chapter 7, Case No. 21-22304 (SHL)**

**James Carnicelli, Jr. and Howard P. Magaliff, Chapter 7, Trustee of The  
Gateway Development Group, Inc., Plaintiffs, v. John J. Fareri, Julie  
Fareri and Christopher Sheskier, Defendants; Adv. Proc. 21-7093 (the  
"Adversary Proceeding")**

Honorable Judge:

This firm represents James Carnicelli Jr. ("Mr. Carnicelli"). We write this letter, at the Court's request, regarding the filing of reply papers, and the return date on the Joint Motion of the Trustee and James J. Carnicelli Jr. (collectively, "Plaintiffs") to Remand this proceeding to Connecticut Superior Court.

We are requesting that Plaintiffs have leave to file reply papers by October 10, 2022. We further request that the hearing on the Motion to Remand occur the following week, if that is convenient to the Court.

DAVIDOFF HUTCHER & CITRON LLP

September 16, 2022

Honorable Sean H. Lane  
U.S. Bankruptcy Judge  
Page -2-

We thank the Court in advance for its consideration of these issues. If you have any questions, please do not hesitate to contact the undersigned.

Respectfully,

/s/ Robert L. Rattet

CC: All counsel via ECF

**MEMORANDUM ENDORSED ORDER:**

**The proposed briefing schedule is approved. The Court will schedule a hearing on the motion to remand after it has had an opportunity to review all the parties' submissions.**

**So Ordered.**

**Dated: September 21, 2022**

**/s/ Sean H. Lane**  
**United States Bankruptcy Judge**